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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

ELIAS LICONA GODINEZ

Plaintiff,

v.

KRISTI NOEM, Secretary of the United States
Department of Homeland Security, *et al.*,

Defendants.

Case No.: 4:25-cv-04077 HSG

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS' RESPONSE TO PLAINTIFF'S
COMPLAINT; AND ORDER**

The parties hereby stipulate to an extension of time for Defendants' response to Plaintiff's complaint. Defendants will file their response on or before August 18, 2025. The parties make this request because Defendants need a brief period of additional time to prepare their response.

The parties further request a corresponding extension on the deadline for filing a motion for summary judgment under the Court's Immigration Mandamus Procedural Order. Dkt. No. 4. Currently, Defendants must file a motion for summary judgment by 120 days after the complaint was served, or September 16, 2025. In view of the agreed-upon extension for Defendants' response to the complaint, the parties request that Defendants must file their motion for summary judgment by October 16, 2025.

Respectfully submitted,¹

PATRICK D. ROBBINS
Acting United States Attorney

Dated: July 18, 2025

/s/ Molly Friend
MOLLY FRIEND
Assistant United States Attorney
Attorneys for Defendants


Dated: July 18, 2025

/s/ Josh F. Sigal
JOSH F. SIGAL
Mendelson Law Firm, A.P.C.
Attorney for Plaintiff

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Date: 7/21/2025


HAYWOOD S. GILLIAM, JR.
United States District Judge

¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.